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August 4, 2011

William Reilly, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency, Region II
290 Broadway, 17th Floor
New York, NY 10007-1866

Re: Response to Request for Information – Riverside Avenue, Newark, NJ

Dear Mr. Reilly:

Enclosed please find the response by SABIC Innovative Plastics US LLC (the "SABIC-IP") to the April 8, 2011 request for information issued by EPA to General Electric Company. Per General Electric's own response letter to you dated May 27, 2011, General Electric has requested SABIC-IP to respond to EPA's request. This response by SABIC-IP is based only upon transactions by the former General Electric Plastics business and/or SABIC-IP, but not upon any transactions, if any exist, by any other General Electric unit.

Please let me know if you have any questions or need any further information on this matter.

Sincerely,


Andrew S. Hogeland

cc: Marissa Truono (w/o documents)
Removal Action Branch
U.S. Environmental Protection Agency, region II
2890 Woodbridge Avenue, Bldg 209
Edison, NJ 08837

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Responses of SABIC Innovative Plastics US LLC to Questions Posed in EPA's April 8, 2011
CERCLA 104(e) Request to General Electric Company

At the request of General Electric Company ("General Electric"), SABIC Innovative Plastics US LLC ("SABIC-IP") has prepared the following response to EPA's April 8, 2011 CERCLA 104(e) request to General Electric. General Electric has submitted its response by letter dated May 27, 2011. This response by SABIC-IP is based only upon transactions by the former General Electric Plastics business and/or SABIC-IP, but not upon any transactions, if any exist, by any other General Electric unit. The ability of SABIC-IP to respond to this request is constrained by the passage of time and changes in personnel so SABIC-IP reserves the right to supplement or modify the information and documents produced in the event additional information becomes available. The information presented herein is based on information and belief based on documents searched and inquiries as of the date of this response. SABIC-IP also objects to the request to the extent it is overbroad, unduly burdensome, seeks information not related to the Site or that may be privileged or confidential.

1. a. SABIC Innovative Plastics US LLC
1 Plastics Avenue
Pittsfield, MA 01201
 - b. Charles Crew
 - c. 2007 in Delaware
Delaware - The Corporation Trust Company, 1209 Orange Street, Wilmington, DE 19801
New Jersey - The Corporation Trust Company, 820 Bear Tavern Road, West Trenton, NJ 08628
 - d. SABIC Innovative Plastics US LLC is ultimately a subsidiary of Saudi Basic Industries Corporation and was formed in 2007 in connection with the sale of the former General Electric Plastics business from General Electric to a SABIC subsidiary.
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2. a. 1.No
2.No
3.No
4. Yes
5. Through Frey Industries, Inc.
 - b. 1. No
2. No
3. No
4. No
 - c. 1. No
2. No
3. No
4. No

- d. 1. No
- 2. No
- 3. No
- 4. Yes

With respect to questions 2.a.4-5 and 2.d.4, please note that the former General Electric Plastics facility located in Selkirk, New York, which is now part of SABIC Innovative Plastics US LLC, contracted with Frey Industries, Inc. for the repackaging of products from the Selkirk facility for sale and delivery to customers. The materials were primarily ortho-cresol, and cresylic acid blends which were delivered to Frey in liquid form in bulk containers. Details of shipments and quantities can be found in the documents being produced in conjunction with this response. The materials sent to Frey were commercial products for sale, were not wastes, were not sent for treatment, and were not sent as part of any arrangement for disposal within the meaning of CERCLA section 107. See Burlington Northern and Santa Fe Railway Company v. United States, 129 S. Ct. 1870 (2009).

3a-g. See response above and documents produced.

- 4.a. No
- b. No
- c. No
- d. No materials were 'taken' by Frey, but products (not industrial wastes) were delivered to Frey. See response above and documents produced.

5. Yes, but only to the extent that the Selkirk products were transported to the Site, not for disposal. See response above and documents produced.

6. Charles Lawlor, Robert Fox, BethAnne Conley and Andrew Hogeland – all current employees of SABIC Innovative Plastics.

7. Documents responsive to the request for records 7.a, b and g (second) are being provided. No documents have been found that are responsive to requests 7.c, d, e, f, g (first) or h.